



U.S. Department of Justice

United States Attorney  
Southern District of New York

86 Chambers Street  
New York, New York 10007

February 2, 2024

**By ECF**

The Honorable Naomi Reice Buchwald  
United States District Judge  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl St.  
New York, NY 10007-1312

Re: *Center for Constitutional Rights v. United States Department of Defense et al.*,  
23 Civ. 7689 (NRB)

Dear Judge Buchwald:

This Office represents the United States Department of Defense (“DOD”), the United States Department of State (“DOS”), and the United States Department of Homeland Security (“DHS”) (collectively, the “Government”), defendants in this action brought pursuant to the Freedom of Information Act, 5 U.S.C. § 552 (“FOIA”). This case concerns a FOIA request submitted by Plaintiff to DOD, DOS, and DHS pertaining to specific locations where Plaintiff alleges the United States transferred and detained Afghan evacuees (the “FOIA Request”) and seeking records related to alleged transfers, detentions, and locations.

We write jointly with Plaintiff’s counsel to request a four-day extension of the parties’ deadline to submit a joint status report, from Monday, February 12, 2024, to Friday, February 16, 2024. The parties are actively engaged in meeting and conferring on the processing of this FOIA Request and have a meet and confer scheduled for February 12, 2024. The requested extension would allow the parties to meet and confer on February 12, 2024, and provide the Court with the most up-to-date information on the status of this case. This is the parties’ first request for an extension of the deadline to submit a joint status report.

We thank the Court for its attention to this matter.

Respectfully,

DAMIAN WILLIAMS  
United States Attorney for the  
Southern District of New York

By: /s/ Elizabeth J. Kim  
ELIZABETH J. KIM  
Assistant United States Attorney  
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Application granted.

SO ORDERED.

  
NAOMI REICE BUCHWALD  
UNITED STATES DISTRICT JUDGE

Dated: February 5, 2024  
New York, NY

Email: Elizabeth.Kim@usdoj.gov  
*Counsel for DOD, DOS, and DHS*

/s/ Sadaf Doost

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